

 **BELLSOUTH**  
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February 11, 2004

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TRA DOCKET ROOM

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's  
Triennial Review Order (Nine-month Proceeding)(Switching)*  
Docket No. 03-00491

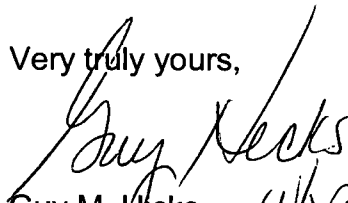

Dear Chairman Tate

Pursuant to the Hearing Officer's *Order Granting AT&T Motion to Require BellSouth to Respond to Discovery* entered February 6, 2004, enclosed are the original and fourteen copies of the non-proprietary portions of BellSouth's response to AT&T's *Second Set of Interrogatories*. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M Hicks

GMH:ch

  
w/permission  


**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

In Re	)	
	)	Docket No. 03-00491
IMPLEMENTATION OF THE FEDERAL	)	
COMMUNICATIONS COMMISSION'S	)	
TRIENNIAL REVIEW ORDER – 9	)	Filed February 11, 2004
MONTH PROCEEDING – SWITCHING	)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES TO  
AT&T COMMUNICATIONS OF THE SOUTH CENTRAL, LLC'S  
SECOND SET OF INTERROGATORIES**

Pursuant to the February 6, 2004 Order of the Tennessee Regulatory Authority  
("Authority"), BellSouth Telecommunications, Inc ("BellSouth") respectfully submits its  
Responses to the AT&T Communications of the South Central States, LLC's ("AT&T") Second  
Set of Interrogatories served on January 20, 2004

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In Re	)	
	)	Docket No 03-00491
IMPLEMENTATION OF THE FEDERAL	)	
COMMUNICATIONS COMMISSION'S	)	
TRIENNIAL REVIEW ORDER – 9	)	Filed: February 11, 2004
MONTH PROCEEDING – SWITCHING	)	

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Pursuant to the February 6, 2004 Order of the Tennessee Regulatory Authority (“Authority”), BellSouth Telecommunications, Inc (“BellSouth”) respectfully submits its Responses to the AT&T Communications of the South Central States, LLC’s (“AT&T”) Second Set of Interrogatories served on January 20, 2004.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 03-00491  
AT&T's 2nd Interrogatories  
January 20, 2004  
Item No. 113  
Page 1 of 1

**REQUEST:** Please indicate the number of "ported" residential telephone numbers to each CLEC, in each market listed in BellSouth Witness Pamela A Tipton Direct Testimony Exhibit PAT-5 Please provide this information, if available, by month and by CLEC over the past 24 months or whatever time period Ms. Tipton relied on for her testimony

**RESPONSE:** The information responsive to this Interrogatory is contained in the enclosed CD-ROM. These documents contain confidential information that is arguably protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided in response to the Authority's February 6, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery and is being filed subject to the terms of the parties' Protective Agreement and the Authority's Protective Order.

**REQUEST:** Please indicate the number of "extracted" business class loops to each CLEC, in each market listed in BellSouth Witness Pamela A Tipton Direct Testimony Exhibit PAT-5 Please provide this information, if available, by month and by CLEC over the past 24 months or whatever time period Ms Tipton relied on for her testimony

**RESPONSE:** The information responsive to this Interrogatory is contained in the enclosed CD-ROM These documents contain confidential information that is arguably protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided in response to the Authority's February 6, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery and is being filed subject to the terms of the parties' Protective Agreement and the Authority's Protective Order

REQUEST Please provide for the last eighteen months, by month, by market, by wire center within the market, and by CLEC the number of

- a. 2-Wire UNE loops;
- b. 4- Wire UNE loops,
- c. DS1 UNE loops;
- d DS3 UNE loops;
- e. DS0 EELs;
- f. DS1 EELs;
- g DS3 EELs,
- h T-1 Special Access lines; and
- i DS3/T-3 Special Access lines

J  
provisioned to the CLECs listed in BellSouth Witness Pamela A Tipton Direct  
Testimony Exhibit PAT-5

RESPONSE. The information responsive to this Interrogatory is contained in the enclosed CD-ROM. These documents contain confidential information that is arguably protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided in response to the Authority's February 6, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery and is being filed subject to the terms of the parties' Protective Agreement and the Authority's Protective Order.

REQUEST. Please provide all information "related to the actual deployment that exists in 7 of the 10 markets." Including at a minimum

- a The identify each of the switches claimed to be providing service to mass market customers, by owner, location and CLLI code,
- b The number of mass market customers claimed to be served from each switch,
- c The number of "ported" residential telephone numbers to each CLEC, in each market listed Please provide this information, if available, by month, and by CLEC over the past 24 months.
- d The number of "extracted" business class loop to each CLEC, in each market listed. Please provide this information, if available, by month and by CLEC over the past 24 months
- e For the last eighteen months, by month, by market, by wire center within the market, and by CLEC the number of:
  - i. 2W UNE loops;
  - ii. 4W UNE loops,
  - iii. DS1 UNE loops;
  - iv DS3 UNE loops,
  - v DS0 EELs;
  - vi DS1 EELs;
  - vii. DS3 EELs,
  - viii T-1 Special Access lines;
  - ix DS3/T-3 Special Access lines,

provisioned to the CLECs listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-7

RESPONSE: a. Of the CLECs BellSouth has identified as having actual deployment in markets where the triggers are not met, BellSouth is providing a list of switches these CLEC have identified as those they own and use to provide qualifying service in Tennessee. The information responsive to this Interrogatory is contained in the enclosed CD-ROM These documents contain confidential information that is arguably protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided in response to the Authority's February 6, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery and is being filed subject to the terms of the parties' Protective Agreement and the Authority's Protective Order

RESPONSE (CONT'D)

- b. BellSouth states that Pamela Tipton's Direct Testimony in Tennessee does not discuss "the actual deployment that exists in 7 of the 10 markets." For purposes of this response, BellSouth assumes that AT&T is referring to Pamela Tipton's Direct Testimony at page 15, lines 9 and 10 which states "...one CLEC is serving mass-market customers using its' own switch in one of those markets "

BellSouth did not request that CLECs provide the number of mass-market customers served by each CLEC switch. BellSouth has made a conservative assumption that the switches identified by CLECs as providing qualifying service in Tennessee serve the general geographic area within which the switch resides

- c. Please see BellSouth's Response to AT&T's Second Set of Interrogatories, Item No 113
- d. Please see BellSouth's Response to AT&T's Second Set of Interrogatories, Item No 114.
- e Please see BellSouth's Response to AT&T's Second Set of Interrogatories, Item No. 115



## CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated

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at permission *ck*